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May 21, 2023

**VIA E-FILING**

Hon. J. Brendan Day, U.S.M.J.  
U.S. District Court  
402 East State Street  
Trenton, NJ 08608

Re: *Association Of New Jersey Rifle & Pistol Clubs,  
Inc. et al. v. Platkin et al. ("ANJRPC")*  
Docket No. 3:18-cv-10507  
*Cheeseman et al. v. Platkin et al.*  
Docket No. 1:22-cv-04360  
*Ellman et al. v. Platkin et al.*  
Docket No. 3:22-cv-04397  
**Joint Discovery Status Letter**

Dear Judge Day:

I represent State Defendants in these above-captioned consolidated matters. Pursuant to the Court's May 11, 2023 text order, the parties wish to provide the following joint status letter.<sup>1</sup>

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<sup>1</sup> As of the e-filing of this letter, the undersigned has not yet heard back from counsel for Chief Brown, a defendant in the *Ellman* matter. Acknowledging the Court's direction in its May 11, 2023 text order regarding submission of this letter ahead of the May 23 conference, the parties did not want to delay any longer. That said, as explained herein the other parties are unaware of any dispute or other issue that any party, including defendant Brown, would raise to this Court at this time.



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Pursuant to the Court's Pretrial Scheduling Order (*see ANJRPC*, Dkt. 154), the parties have exchanged initial disclosures, served written discovery requests and responded to same, and identified affirmative experts by name and subject area. Plaintiffs did not amend their pleadings or join new parties. Further, no parties wish to conduct any fact witness depositions.

None of the parties have any dispute or other issue they wish to bring to the Court's attention at this time.

Thank you for the Court's attention to this matter.

Respectfully submitted,

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ATTORNEY GENERAL OF NEW JERSEY

By: /s/ Daniel M. Vannella  
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cc: All counsel of record (via ECF)